

## Huff, Gwen

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**From:** Chorneau, Charlotte [cchorneau@ccp.csus.edu]  
**Sent:** Tuesday, June 08, 2010 2:31 AM  
**To:** Water Use Efficiency  
**Subject:** FW: USC 20X2020 U3 Technical Methodology Papers

**Attachments:** June 7 comment letter.pdf



June 7  
comment letter.pdf (6

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From: Harris, Richard [rharris@ebmud.com]  
Sent: Monday, June 07, 2010 10:47 PM  
To: Chorneau, Charlotte  
Cc: Alemi, Manucher; Brostrom, Peter N.; Guivetchi, Kamyar; Chris Brown; Ceppos, David M  
Subject: USC 20X2020 U3 Technical Methodology Papers

Hi Charlotte - attached are my comments on the draft methodology/technical issues papers for Agency Team and USC discussion at our upcoming June 22nd meeting in So. CA.

I included a couple text edits as well as general comments for consideration.

Regards,  
Richard

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June 7, 2010

Manucher Alemi, Ph.D., P.E.  
Chief, Water Use and Efficiency Branch  
Division of Statewide Integrated Water Management  
Department of Water Resources  
901 P Street  
Sacramento, CA 95814

RE: Comments on 20X2020 Draft Urban Methodologies

Dear Dr. Alemi:

Per the Urban Stakeholder Committee (USC) meetings on May 18 and June 1, 2010, enclosed are additional comments on the Draft Urban Methodology Issue Papers for discussion at the next USC meeting scheduled for June 22, 2010.

## **1. Methodology 1: Gross Water Use**

Comment: Threshold criteria of 4% of gross water use and 20% of commercial and industrial uses for industrial process water optional removal from baseline are arbitrary and overly prescriptive.

Recommendation: Urban water agencies should reserve judgment on determining what constitutes “substantial industrial water use” for purposes of calculating how much process water can be excluded from the agency’s gross water use calculations. A substantial impact would be any quantity and/or change in process water use that would result in a water supplier meeting or not meeting its defined interim or final target. Individual water agency characteristics and quantity of process water supplied varies greatly statewide and applying a set number or percentage for all water suppliers would not be a good approach given this variability.

Suggested Text Edits: Pg. 1-5, rewrite *Step 11 (Optional): Deduct the volume of water delivered for process water use*. This step is necessary only if the urban water supplier has elected to exclude process water from the calculation of Gross Water Use ~~and is eligible to do so~~. An urban ~~retail~~ water supplier is eligible to exclude process water from the calculation of Gross Water Use ~~only~~ if its industrial water use comprises a substantial percentage of total water use **sufficient to alter the agency’s compliance with interim and/or final compliance targets**. *Note: Delete remainder of paragraphs thru Pg. 1-6.*

## **2. Methodology 2: Service Area Population**

Comment: Maintain flexibility in sources and methods for determining service area population.

Recommendation: Water agencies have a history of using a variety of federal, state, regional and local reports and references when calculating service area population and the adopted methodology should remain flexible so long as the selected sources and methods are applied consistently overtime and especially between the baseline and compliance years.

### **3. Methodology 3: Base Per Capita Water Use**

Comment: Include option for cumulative gross water use and population totals to be used in base per capita water use compliance calculations in lieu of averaging annual values.

Recommendation: Process should allow water supplier documented/derived data sources and methods to be used in determining baseline per capita water use as long as the methods are consistent between baseline and compliance years.

### **4. Methodology 6: Landscape Area Water Use**

Comment: Need to further clarify and expand on alternative methodologies, including satellite imagery, for calculating landscape area water use consistent with the SBx7-7 legislation.

Recommendation: As currently being deployed by a number of urban agencies, alternative methods that use recognized scientific data, instrumentation and satellite imagery in calculating landscape area water use should be allowed in addition to (and in lieu of) DWR's proposed parcel-by-parcel method. Water agencies have made significant progress in identifying and utilizing the latest technology to provide meaningful data in a timely and cost-effective manner. A parcel-by-parcel approach would not necessarily yield more accurate data and it would likely require much more time and cost to acquire.

### **5. Methodology 7: Baseline Commercial, Industrial and Institutional (CII) Water Use**

Comment: Need to clearly delineate between best practices as defined by the CII Task Force from BMPs referenced under the CUWCC Memorandum of Understanding.

### **6. Methodology 8: Criteria for Compliance Year Adjustments**

Comment: Threshold for "substantial increase" in business output and economic development appears arbitrary. In addition, weather normalization standards are not yet defined and further review and comment will be required when DWR and CUWCC completed their modeling.

Recommendation: Similar to the "process water use" comment under gross water use above, any issue or element that changes a water agencies compliance should be considered "substantial" as determined by the agency. Criteria for "compliance year adjustments" from differences in climate, economy, demographics, or other impacts (yet to be defined) should include any measurable factor that could affect a water agency's compliance with its daily per capita water use target.

Manucher Alemi, Ph.D., P.E.

June 7, 2010

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Suggested Text Edits: Pg. 8-2, “If GPCD still exceeds the target ~~by a substantial amount (>3%)~~ after ~~being~~ adjusting for evapotranspiration and rainfall compliance, water suppliers can...”

## **7. Methodology 9: Regional Compliance Criteria**

Comment: Criteria and methodology for regional compliance needs to be developed and provided to urban water suppliers in a timely manner for UWMP preparation.

Recommendation: Many urban water suppliers deliver various individual retail and wholesale raw and treated water service to their customers. The criteria for regional compliance should provide options for water agencies to report compliance at the retail, wholesale, or Integrated Regional Water Management level.

Thank you again for the opportunity to comment on the Draft Urban Methodologies.

Sincerely,

Richard W. Harris  
USC Member